

**IN THE CIRCUIT COURT  
FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI**

ASHFAQ HUSSAIN SYED, et al,	)	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: 19SL-CC02229-01
	)	<u>JURY TRIAL DEMANDED</u>
FRONTIER AIR LINES, INC., and	)	
HALLMARK AVIATION SERVICES, L.P.	)	<b>NOTICE OF REMOVAL</b>
	)	<b>PURSUANT TO 28 U.S.C. § 1452</b>
Defendants.	)	

**NOTICE OF FILING NOTICE OF REMOVAL**

**TO: CLERK OF COURT**

**PLEASE TAKE NOTICE** that a Notice of Removal of the above-captioned proceeding from the Circuit Court of St. Louis County, State of Missouri to the United States District Court for the Eastern District of Missouri – Eastern Division (the “District Court”), was duly filed on March 18, 2020, 2020 by Defendant Hallmark Aviation Services, L.P. pursuant to 28 U.S.C. § 1452. A true and correct copy of such Notice of Removal (**without exhibits**) is attached hereto as **Exhibit A.**

**PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 1452, jurisdiction now lies exclusively with the District Court and has been divested from this Honorable tribunal.

HEPLERBROOM LLC

By: /s/Michael Reda  
MICHAEL REDA #33591  
MREDA@heplerbroom.com  
211 North Broadway, Suite 2700  
St. Louis, MO 63102  
314/241-6160 – Telephone  
314/241-6116 – Facsimile

Attorneys for Defendant Hallmark Aviation  
Services, L.P.

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed on this 18th day of MARCH, 2020, the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

W. Bevis Schock  
[wbschock@schocklaw.com](mailto:wbschock@schocklaw.com)  
Attorneys for Plaintiffs

Thatcher Stone  
[thatcher@stoneandwoodrowlaw.com](mailto:thatcher@stoneandwoodrowlaw.com)  
Attorney for Plaintiff

William Woodrow  
[will@stoneandwoodrowlaw.com](mailto:will@stoneandwoodrowlaw.com)  
Attorney for Plaintiff

David Berwin  
[dberwin@evans-dixon.com](mailto:dberwin@evans-dixon.com)  
Attorney for Frontier Airlines, Inc.

Tara Shelke  
[tshelke@amm-law.com](mailto:tshelke@amm-law.com)  
Attorney for Frontier Airlines, Inc.

Brian Maye  
[bmaye@amm-law.com](mailto:bmaye@amm-law.com)  
Attorney for Frontier Airlines, Inc.

*Janet M. Helmer*  
Circuit clerk

/s/ Michael Reda

*Swendyn Butts*  
Deputy clerk

